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Newark ■ Philadelphia

June 28, 2019

**VIA ECF**

Hon. Freda L. Wolfson, Chief Judge  
Hon. Tonianne J. Bongiovanni, U.S.M.J.  
U.S. District Court, District of New Jersey  
Clarkson S. Fisher Federal Building &  
U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: *Creighton Takata v. Riot Blockchain, Inc., et al.***  
**Civil Action No.: 18-2293 (FLW) (TJB)**

Dear Judges Wolfson and Bongiovanni:

We represent the Court-appointed Lead Plaintiff Dr. Stanley Golovac ("Plaintiff") and write pursuant to the Court's May 22, 2019 Order (ECF No. 78) in which the Court granted "a stay of deadlines to afford Plaintiff time to serve the newly added Defendants so that a consolidated briefing schedule can be entered" and ordered that a "status update is to be submitted by June 28, 2019."

To date, Plaintiff, through counsel, has served two of the newly added defendants – John Stetson and Mark Groussman. However, despite using best efforts, Plaintiff has been unable to serve the three other three newly added defendants – Catherine DeFrancesco, in Miami, Florida; and Mike Dai and Eric So, in Toronto, Ontario, Canada. Plaintiff's counsel and their agents are continuing to take efforts to serve Defendants DeFrancesco, Dai, and So, including at their listed residences and/or places of business, and hope and expect to complete service of these individuals in the next few weeks.

Despite not yet having been able to serve all new defendants, despite our best efforts, Plaintiff looks forward to advancing this case into the briefing stage.

Respectfully,

*/s/ Joseph J. DePalma*

Joseph J. DePalma

JJD:cd

cc: All Counsel (via ECF)